

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION I

J.F. KENNEDY FEDERAL BUILDING, BOSTON, MASSACHUSETTS 02203-2211



October 27, 1993

Mr. Fred Evans
Department of the Navy
Northern Division
Naval Facilities Engineering Command
10 Industrial Highway, Mailstop 82
Lester, PA 19113-2090

Re: Draft Final Technical Memorandum
Site 9
Neptune Drive Disposal Area
September 1993

Dear Fred:

The United States Environmental Protection Agency (EPA) has reviewed the document entitled "Draft Final Technical Memorandum, Site 9, Neptune Drive Disposal Site" dated September 1993. EPA's comments can be found in Attachment I of this letter.

In this technical memorandum, the Navy recommends "natural attenuation with no further action other than institutional controls and groundwater monitoring" for both north and south of Neptune Drive.

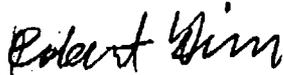
However from the conference call held on Friday afternoon, October 22, 1993, and the site visit held on Tuesday morning, October 26, 1993, the Navy has proposed to monitor Site 9 through a different mechanism and to discontinue the future submission of a Proposed Plan and Record of Decision (ROD). It must be made clear though that the monitoring of Site 9 is considered a remedial action by EPA and the Navy must document this action through the formal remedy selection process.

According to the schedule accompanying the technical memorandum, the Navy has scheduled a ROD for Site 9 by the summer of 1994. In light of the situation, the EPA suggests that the Navy propose an Interim Action ROD which would be then be followed by a final ROD when a satisfactory groundwater database has been established.



Perhaps another conference call can be scheduled to discuss Site 9 further, but should you have any immediate questions regarding EPA's comments, please contact me at (617) 223-5521.

Sincerely,



Robert Lim
Remedial Project Manager

cc. Meghan Cassidy/USEPA
Nancy Beardsley/ME DEP
Jim Caruthers/NASB
Susan Weddle/BASCE
Carolyn LePage/Gerber, Inc.
Sam Butcher/Harpswell Community Rep.
Rene Bernier/Topsham Community Rep.

Enclosures

ATTACHMENT I

The following are EPA's comments pertaining to the document entitled "Draft Final Technical Memorandum, Site 9, Neptune Drive Disposal Site" dated September 1993.

1. General - It is clear from the new data that the cesspool is not currently a source of the VOC contamination found in the well in the area south of Neptune Drive. However, the cesspool has not completely been ruled out as a past source. It is assumed then that the proposed monitoring plan and future data would answer this question.
2. General - If possible, EPA suggests starting the monitoring program as soon as possible and accumulating groundwater data to establish a database with some degree of continuity.
3. General - The EPA anticipates the review of the draft Proposed Plan for Site 9 with the Navy's preferred alternative. Based on the information presented in this technical memorandum, EPA concurs with the Navy and believes that, at this time, an Interim No Further Action ROD with institutional controls and a long term monitoring plan is the most practical solution for Site 9.
4. pg 2-4, Figure 2-2 - Delete "LT-901 New Leachate and Sediment Sampling Point" from Legend because it is not shown on figure.
5. pg 2-12, 2.2.1.2 Inactive Ash Landfill, ¶ 3 - According to Table 2-5, barium was also detected at values above background concentrations. Add barium to "Cadmium, calcium, chromium..."
6. pg 2-25, 2.2.2 South of Neptune Drive, ¶ 1 - In light of new data and recommendations, is the referenced draft proposed plan with a preferred alternative of source removal/off-site disposal still valid?
7. pg 2-26 - Please provide rationale for TCLP testing the cesspool borings (i.e. was this done in anticipation triggering "lan ban" requirements?). In addition, for what TCLP parameters were the the cesspool borings tested? ICR, toxicity, or both.